

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

COLLEEN KUCHAR,	)	
	)	
Plaintiff,	)	CASE NO. 1:20-cv-02542
	)	
v.	)	JUDGE JAMES S. GWIN
	)	
SABER HEALTHCARE HOLDINGS,	)	
LLC, et al.,	)	
	)	
Defendants.	)	

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**DEFENDANTS' MOTION FOR LEAVE TO EXCEED PAGE LIMITATIONS FOR  
MOTION TO DECERTIFY FLSA COLLECTIVE ACTION, MOTION TO DECERTIFY  
RULE 23 CLASS ACTION, AND MOTION FOR SUMMARY JUDGMENT**

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Defendants, Saber Healthcare Holdings, LLC, Saber Healthcare Group, LLC, Multi-Care Management, Inc., and Aurora Manor, L.P. (collectively “Defendants”), by and through their counsel, respectfully request leave to exceed the page limitations for the memoranda that will accompany their Motion to Decertify FLSA Collective Action, Motion to Decertify Rule 23 Class Action, and Motion for Summary Judgment.

Local Rule 7.1(f) imposes limitations of 15 pages for non-dispositive motions and 20 pages for dispositive motions. Given the number of Defendants, Plaintiffs and Opt-In Plaintiffs, as well as the complexity of the legal and factual issues related to FLSA collective action certification, Rule 23 class action certification, and summary judgment in that context, Defendants anticipate they will need to exceed the standard page limits in order to thoroughly and comprehensively brief the issues before the Court. Accordingly, Defendants request leave to

exceed the page limitations of Local Rule 7.1(f), but not to exceed 25 pages, for each of the above-referenced motions.

Respectfully submitted,

/s/ Mark S. Fusco

Mark S. Fusco (Reg. No. 0040604)

Email: [mfusco@walterhav.com](mailto:mfusco@walterhav.com)

Direct Dial: 216-619-7839

Sara Ravas Cooper (Reg. No. 0076543)

Email: [scooper@walterhav.com](mailto:scooper@walterhav.com)

Direct Dial: 216-928-2898

Russell T. Rendall (Reg. No. 0089901)

Email: [rrendall@walterhav.com](mailto:rrendall@walterhav.com)

Direct Dial: 216-658-6237

WALTER | HAVERFIELD LLP

1301 E. Ninth Street, Suite 3500

Cleveland, Ohio 44114

(216) 781-1212 telephone

(216) 575-0911 facsimile

*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

A copy of the foregoing *Defendants' Motion for Leave to Exceed Page Limitations for Motion to Decertify FLSA Collective Action, Motion to Decertify Rule 23 Class Action, and Motion for Summary Judgment* has been filed this 20th day of January, 2022, through the Court's electronic filing system. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Mark S. Fusco

Attorney for Defendants